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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARGARET ROSE CURRY,

Plaintiff,

vs.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

)
) Case No.: 2:21-cv-00555-CLB
)
) **UNOPPOSED MOTION FOR EXTENSION OF**
) **TIME TO FILE ANSWERING BRIEF**
)
) **(FIRST REQUEST)**
)
)
)
)

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security, by and through her
 2 undersigned attorneys, hereby moves for a 21-day extension of time to file her Answering Brief,
 3 changing the date on which the Answering Brief is due from June 9, 2022, to June 30, 2022. This is
 4 Defendant's first request for an extension to file her Answering Brief. Defendant conferred with counsel
 5 for Plaintiff, who confirmed on June 6, 2022, that Plaintiff does not object to this request.

6 Defendant submits that good cause exists for this extension because the attorney tasked with
 7 writing the Answering Brief has several concurrent deadlines and needs sufficient time to review the
 8 record, evaluate the issues raised in Plaintiff's Opening Brief, and prepare Defendant's brief. Defendant's
 9 counsel will endeavor to complete these tasks as soon as possible. This request is made in good faith and
 10 with no intention to unduly delay the proceedings, and counsel apologizes for any inconvenience.

11 WHEREFORE, Defendant requests until June 30, 2022, to file her Answering Brief.

12 Respectfully submitted,

13 Date: June 6, 2022

/s/ *Hal Taylor
 By: HAL TAYLOR
 (*authorized by email on June 6, 2022)
 Attorney for Plaintiff

16 Date: June 6, 2022

JASON M. FRIERSON
 Acting United States Attorney

/s/ Michonne L. Omo
 MICHONNE L. OMO
 Special Assistant United States Attorney

22 IT IS SO ORDERED:

23 
 UNITED STATES MAGISTRATE JUDGE

24 DATED: June 6, 2022
 25
 26

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Hal Taylor
haltaylorlawyer@gbis.com
Attorneys for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 6, 2022

/s/ Michonne L. Omo
MICHONNE L. OMO
Special Assistant United States Attorney